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July 7, 2023

VIA EMAIL

Honorable Lisa G. Beckerman
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Rm. 623
New York, NY 10004-1408

Re: Erbo Properties LLC et al (the “Debtors”)
Case No. 23-10210

Dear Judge Beckerman:

I am proposed substitute counsel to the Debtors.

I attach a Notice of Voluntary Dismissal of the removed case which was started in state court this week. The document was filed this morning.

Sincerely,

/s/Isaac Nutovic
Isaac Nutovic

cc: M.S. Bauer

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ERBO PROPERTIES LLC, KOVA 521 LLC,
GOLD MEZZ LLC, LAZAR BODEK, ERNO
BODEK, and RACHEL BODEK,

Plaintiffs,

v.

541 W 21 SME LLC,

Defendant.

Civil Action No.: 1:23-cv-05174

**NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT
TO FED. R. CIV. P. 41(a)**

PLEASE TAKE NOTICE that Plaintiffs Erbo Properties LLC (“Erbo”), Kova 521 LLC (“Kova”), Gold Mezz LLC (“Gold”), Lazar Bodek, Erno Bodek, and Rachel Bodek (collectively, the “Plaintiffs”), by and through their attorneys **THE ROSENFELD LAW OFFICE**, hereby withdraw and voluntarily dismiss their complaint against Defendant 541 W 21 SME LLC (“Defendant”), without prejudice pursuant to Federal Rule of Civil Procedure 41(a).

Dated: New York, New York
July 6, 2023

THE ROSENFELD LAW OFFICE
Attorneys for Plaintiffs

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